

Received & Inspected

JAN 19 2012

FCC Mail Room

January 3, 2012

VIA OVERNIGHT MAIL

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Suite TW-A325  
Washington, DC 20554

RE: Cleveland Unlimited, Inc., dba Revol Wireless  
Annual 64.2009(e) CPNI Certification for 2012

Dear Ms. Dortch:

Enclosed please find the Annual 47 C.F.R. §64.2009(3) CPNI Certification EB Docket No. 06-36 for Cleveland Unlimited, Inc., dba Revol Wireless, together with an accompanying statement explaining how Revol's procedures ensure we are in compliance with the requirements set forth in Section 64.2001 et seq. of the commission's rules.

Should you need any additional information in regard to Cleveland Unlimited, Inc., to ensure our compliance with the Commission's request, please contact me at 216-525-1129 or via email at

[john.ranieri@revol.com](mailto:john.ranieri@revol.com)

Thank you for your attention to this matter.

Sincerely,

Cleveland Unlimited, Inc., dba  
Revol Wireless



John Ranieri  
Chief Financial Officer

JR/nb

Encl.

revol<sup>®</sup>  
wireless

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 2009(e) CPNI Certification for 2012 covering the prior calendar year 2011.

Filed: January 4, 2012

D.

Name of company covered by this certification<sup>1</sup>: Cleveland Unlimited, Inc. d/b/a Revol Wireless

Form 499 Filer ID: 824878

Name of signatory: John Ranieri

Title of signatory: CFO

I, John Ranieri, certify that I am an officer of Cleveland Unlimited, Inc. d/b/a Revol Wireless ("Revol"), and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

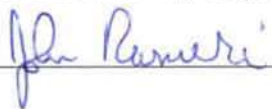
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of the CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (ie proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



<sup>1</sup> This certification also covers Cleveland Unlimited License Sub, LLC, a wholly-owned subsidiary of Revol that holds licenses issued by the Commission but does not have its own Form 499 Filer ID because it is included in Form 499 filings made by Revol.

### Statement

Revol is a provider of Commercial Mobile Radio Service ("CMRS") and does not offer telecommunications services to its customers in categories other than CMRS. Revol does not currently use customer proprietary network information ("CPNI") for internal marketing purposes or share CPNI with affiliates or with third parties, other than pursuant to requests by duly-authorized law enforcement officials. Consequently, Revol is not required to and does not maintain either an "opt-in" or "opt-out" system with respect to CPNI. In the event that Revol were to change the ways in which it uses CPNI, any such change would be reviewed and approved by the company's CEO, who is familiar with the FCC's rules governing the use of CPNI and who is the certifying officer for CPNI purposes.

Revol has established procedures to maintain the security of CPNI of its customers. For example, Revol maintains all CPNI on a secure server using a proprietary database, and CPNI is accessible only to select, specially-trained employees within Revol's call center and network operations group. Revol representatives will discuss customer account information only after a caller has presented unique identifying information establishing that the requesting party is, in fact, the subscriber whose records are requested. Revol provides call detail records only to customers who make an in-person request in a Revol store and present valid identification, or to law enforcement officials who present a valid subpoena. The Revol employee handbook expressly prohibits the divulgence of any confidential customer information, and provides for immediate punishment upon a violation of this prohibition, up to and including termination of employment.